

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN RE:	)	
	)	Case No. 08-35653-KRH
	)	(Jointly Administered)
CIRCUIT CITY STORES, INC., <i>et al.</i>	)	
	)	Chapter 11
	)	
DEBTOR.	)	Judge Kevin R. Huennekens
	)	

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**MOTION TO ADMIT DANIEL E. HITCHCOCK  
TO PRACTICE PRO HAC VICE**

Pursuant to Local Rule 2090-1(E)(2), Troy N. Nichols (“Movant”), a member in good standing of the bar of the State of Virginia and the United States District Court for the Eastern District of Virginia, moves this Court to specially admit *pro hac vice* Daniel E. Hitchcock, an attorney of good standing admitted to practice before the courts of the Commonwealth of Kentucky, including the United States District Court for the Eastern District of Kentucky as reflected in the supporting Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2) attached hereto as **Exhibit A**, to practice before this Court in the above-captioned matter and any related proceedings therein, as attorney for Modern Marketing Concepts, Inc. Counsel’s name, office mail address, electronic mail address and telephone number as follows:

Daniel E. Hitchcock (KY 07535)  
WYATT, TARRANT & COMBS, LLP  
250 West Main Street, Suite 1600  
Lexington, KY 40507-1746  
Telephone: (859) 233-2012  
Facsimile: (859) 259-0649  
E-mail: Lexbankruptcy@wyattfirm.com

Movant requests that the Bankruptcy Court authorize Mr. Hitchcock to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in these bankruptcy cases (and related proceedings) on behalf of Modern Marketing Concepts, Inc.

Movant will appear in this bankruptcy case (and related proceedings) as co-counsel as required by Local Rules of the Court.

WHEREFORE, Movant respectfully requests that the Court enter an Order in substantially the same form as attached hereto authorizing Daniel E. Hitchcock to appear *pro hac vice* in these bankruptcy cases (and related proceedings) and grant such other relief as the Court deems just and proper.

Respectfully submitted,

WYATT, TARRANT & COMBS, LLP

/s/ Troy N. Nichols  
Troy N. Nichols (VA 68491)  
250 West Main Street, Suite 1600  
Lexington, KY 40507-1746  
Phone: (859) 233-2012  
Fax: (859) 259-0649  
E-mail: [Lexbankruptcy@wyattfirm.com](mailto:Lexbankruptcy@wyattfirm.com)

COUNSEL FOR MODERN MARKETING  
CONCEPTS, INC.

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Motion to Admit Daniel E. Hitchcock to Practice *Pro Hac Vice* has been served in the method established in the Case Management/Electronic Case Files (CM/ECF) Policy Statement to all parties designated to receive electronic service including Counsel for the Debtor and the Office of the U.S. Trustee, and to the parties listed below via facsimile, electronic and/or first-class, postage prepaid U.S. mail on this 6th day of January, 2011.

Lynn L. Tavenner  
Paula S. Beran  
Tavenner & Beran PLC  
20 North Eighth Street, Second Floor  
Richmond, VA 23219  
*Counsel for Plaintiff, Alfred H. Siegel*

/s/ Troy N. Nichols  
Troy N. Nichols

30577925.1

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35663, \* Case Name Circuit City Stores, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Daniel Ernest Hitchcock  
Bar Identification Number 88927 State Kentucky  
Firm Name WYATT, TARRANT & COMBS, LLP  
Firm Phone # (859) 233-2012 Direct Dial # (859) 288-7435 FAX # (859) 259-0649  
E-Mail Address lexbankruptcy@wyattfirm.com  
Office **Mailing** Address 250 West Main Street, Suite 1600, Lexington, Kentucky 40507-1746  
Name(s) of federal court(s) in which I have been admitted Please see attached.

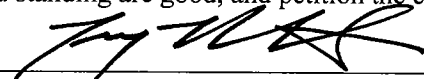
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

  
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

  
(Signature)

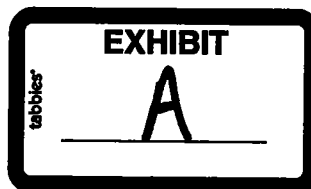
01/06/2011

(Date)

Troy N. Nichols (VA 68491)

(Typed or Printed Name)

\**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.



**DANIEL E. HITCHCOCK (KY 88927)**  
**DATES OF ADMISSION**

Chronological Order

<b>COURT</b>	<b>DATE</b>
Florida Bar (FL 94382)	10/11/96
Kentucky Bar (KY 88927)	10/19/01
United States District Court, Southern District of Florida	10/17/03
United States District Court, Northern District of Florida	10/17/03
United States District Court, Western District of Kentucky	06/09/04
United States District Court, Eastern District of Kentucky	07/01/04
United States Court of Appeals for the Sixth Circuit	10/26/10